

STATEMENT OF BASIS

as required by LAC 33:IX.2411, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0103870; AI51909; PER20090001** to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. **THE APPLICANT IS:** Ascension Parish Government
Trailerland Wastewater Treatment Facility
208 E. Railroad Ave.
Gonzales, LA 70737

- II. **PREPARED BY:** Darlene Bernard

- DATE PREPARED:** September 16, 2009

- III. **PERMIT ACTION:** Reissue LPDES permit LA0103870, AI51909
LPDES application received: April 17, 2009

- LPDES permit effective: March 1, 2004
LPDES permit expired: February 28, 2009
EPA has not retained enforcement authority

IV. **FACILITY INFORMATION:**

- A. The application is for the discharge of treated sanitary wastewater from an existing publicly owned treatment works serving the Trailerland Subdivision.
NOTE: Based upon the previous permit and the impairments of the receiving waters, this facility is being issued an individual permit and not a general permit.

- B. The permit application does not indicate the receipt of industrial wastewater.

- C. The facility is located at 38190 Smith Road, in Prairieville, Ascension Parish.

- D. The treatment facility consists of an Extended Aeration Treatment Plant with Tertiary Sand Filter. Disinfection is by chlorination.

- E. Outfall 001

- Discharge Location: Latitude 30°20'07" North
 Longitude 90°58'34" West

- Description: treated sanitary wastewater

Statement of Basis

Ascension Parish Government/Trailerland Wastewater Treatment Plant

LA0103870

Page 2

Design Capacity: 0.065 MGD

Type of Flow Measurement which the facility is currently using:

Electronic Flow Meter

V. RECEIVING WATERS:

The discharge is into the North Branch Welsh Gully, thence into Bayou Manchac, thence into the Amite River in segment 040201 of the Lake Pontchartrain Basin. Segment 040201 of the Lake Pontchartrain Basin is listed on the 303(d) list of impaired water bodies.

The designated uses and degree of support for Segment 040201 of the Lake Pontchartrain Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment 040201	Degree of Support of Each Use						
Not Supported	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Not Supporting	Not Supporting	Not Supporting	N/A	N/A	N/A	N/A

^{1/}The designated uses and degree of support for Segment 040201 of the Lake Pontchartrain Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Volume 5, Part B, Water Quality Inventory respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 040201 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

Statement of Basis
Ascension Parish Government/Trailerland Wastewater Treatment Plant
LA0103870
Page 3

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the fact sheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

The public notice is published in a local paper of general circulation and the Office of Environmental Services Public Notice Mailing List.

For additional information contact:

Darlene Bernard
Permits Division
Department of Environmental Quality
Office of Environmental Services
PO Box 4313
Baton Rouge, LA 70821-4313

Statement of Basis

Ascension Parish Government/Trailerland Wastewater Treatment Plant

LA0103870

Page 4

IX. PROPOSED PERMIT LIMITS:

Subsegment 040201 of the Lake Pontchartrain Basin is listed on the 2006 303(d) list as impaired for ammonia (Total), phosphorus, nitrogen (nitrate + nitrite as N), organic enrichment/low DO, pathogen indicators, chlorides, sulfates, and TDS. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by additional water quality studies and/or TMDLs.

Organic Enrichment/Low DO, Nitrogen (nitrate + nitrite as N), and Phosphorus

LDEQ's position regarding water quality criteria for nutrients, is that when oxygen-demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. See In The Matter of Sierra Club and Louisiana Environmental Network Request for Nutrient Limits. Docket No. AHD-DR-96001. LDEQ April 29, 1996. LAC 33:IX.2707.D.1.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances through BOD₅ limitations. Compliance with the BOD₅ limitations as an indicator parameter will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with the permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in Part II of the permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards. To protect against the potential for oxygen consuming pollutants that could cause instream DO problems and for the discharges of organic materials, and nutrients at levels exceeding state water quality standards, BOD₅ limitations have been placed in the permit.

Pathogen Indicators

To protect the receiving waterbody from high levels of pathogenic organisms, fecal coliform limitations have been established in the permit.

Ammonia (Total), Chlorides, Sulfates, and TDS

Based on the size and type of the facility and the previous permit, the Department believes that there is little potential for the discharges to have levels of ammonia, chlorides, sulfates and TDS at levels that would exceed state water quality standards.

Statement of Basis
 Ascension Parish Government/Trailerland Wastewater Treatment Plant
 LA0103870
 Page 5

Final Effluent Limits:

OUTFALL 001

Final effluent limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD ₅	N/A	10 mg/l	15 mg/l	Limits are set in accordance with the Areawide Policy for Lake Pontchartrain Basin Segment 0402 for facilities of this treatment type and size.
TSS	N/A	15 mg/l	23 mg/l	Since there are no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.

Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurements.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.a, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgment in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities

Statement of Basis
 Ascension Parish Government/Trailerland Wastewater Treatment Plant
 LA0103870
 Page 6

have demonstrated an ability to comply with these limitations using present available technology.

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. **PREVIOUS PERMITS:**

LPDES Permit No LA0103870:	Issued:	February 6, 2004
	Effective:	March 1, 2004
	Expired:	February 28, 2009

During the period beginning the effective date of the permit and lasting through the expiration date of the permit (Design 0.065 MGD)

Effluent Characteristic	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Monthly Avg.</u>	<u>Weekly Avg.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
BOD ₅	10 mg/l	15 mg/l	1/month	Grab
TSS	15 mg/l	23 mg/l	1/month	Grab
Fecal Coliform	200	400	1/month	Grab
pH	6-9 Standard Units		1/month	Grab

XI. **ENFORCEMENT AND SURVEILLANCE ACTIONS:**

A) **Inspections**

A review of EDMS indicates the following inspections were performed for this facility:

Date – August 20, 2007

Findings and/or Violations:

A facility inspection was conducted as a result of an incident report. One of two lift stations pumps went out and was replaced. The replacement pump burned out and another pump was ordered, but it took three days to arrive. While waiting for

Statement of Basis

Ascension Parish Government/Trailerland Wastewater Treatment Plant

LA0103870

Page 7

the pump, 9,000 gallons of sewage were removed from the lift station every afternoon by vacuum truck. In order to prevent sewage backups into homes, a temporary submersible pump was placed within the lift station and allowed to discharge to a nearby ditch. This pump was used to keep the lift station level down each day until it could be pumped out via vacuum truck. It was estimated that the pump discharged at least 300 gallons of liquid per day for three days to the ditch. Lift station floats and capacitors were also changed. Facility now has a spare lift station pump.

Date – September 10, 2008

Findings and/or Violations:

A Hurricane Assessment Inspection was conducted to assess damages to the wastewater treatment plant from Hurricane Gustav. The plant was operating. There was no apparent hurricane damage.

B) Compliance and/or Administrative Orders

A review of EDMS revealed that there are no recent enforcement actions administered against this facility.

C) DMR Review

A review of the discharge monitoring reports for the period beginning January 1, 2007 to March 31, 2009 has revealed the following violations:

Date	Parameter	DMR Reported Value	Permit Limit
03-07	BOD ₅ , Monthly Avg.	14 mg/l	10 mg/l
	TSS, Monthly Avg.	17 mg/l	15 mg/l
07-07	BOD ₅ , Monthly Avg.	16 mg/l	10 mg/l
	BOD ₅ , Weekly Avg.	18 mg/l	15 mg/l
	TSS, Monthly Avg.	19 mg/l	15 mg/l
	TSS, Weekly Avg.	50 mg/l	23 mg/l
10-07	Fecal Coliform, Weekly Avg.	1080 colonies/100 ml	400 colonies/100 ml
12-08	BOD ₅ , Monthly Avg.	15 mg/l	10 mg/l
	BOD ₅ , Weekly Avg.	28 mg/l	15 mg/l
01-09	BOD ₅ , Monthly Avg.	16 mg/l	10 mg/l
	BOD ₅ , Weekly Avg.	18 mg/l	15 mg/l

NOTE: There were no DMRs on file in EDMS from 01-01-08 to 06-30-08.

Statement of Basis

Ascension Parish Government/Trailerland Wastewater Treatment Plant

LA0103870

Page 8

XII. ADDITIONAL INFORMATION:

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows between 0.02 and 0.1 MGD.

Effluent CharacteristicsMonitoring Requirements

	<u>Measurement</u>	<u>Sample</u>
	<u>Frequency</u>	<u>Type</u>
Flow	Continuous	Recorder
BOD ₅	1/month	Grab
Total Suspended Solids	1/month	Grab
Fecal Coliform Bacteria	1/month	Grab
pH	1/month	Grab

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, it is recommended that LDEQ Option 1 Pretreatment Language be included in LPDES Permit LA0103870. This language is established for municipalities that do not have either an approved or required Pretreatment program. This recommendation is in accordance with 40 CFR Part 403 regulations, the General Pretreatment Regulations for Existing and New Sources of Pollution contained in LAC Title 33, Part IX, Chapter 61 and the Best Professional Judgement (BPJ) of the reviewer.

XIII. TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

Statement of Basis
Ascension Parish Government/Trailerland Wastewater Treatment Plant
LA0103870
Page 9

XIV. REFERENCES:

Louisiana Water Quality Management Plan, Vol. 10, "Wasteload Allocations and Discharger Inventory", Louisiana Department of Environmental Quality, 1992.

Louisiana Water Quality Management Plan, Vol. 5-B, "Water Quality Inventory", Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards", Louisiana Department of Environmental Quality, 1999.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 23 - "The LPDES Program", Louisiana Department of Environmental Quality, 1999.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Ascension Parish Government, Trailerland Wastewater Treatment Plant, April 17, 2009.